

REMARKS

All of the claims pending after amendment herein (7- 10 and 15-20) have been rejected as anticipated by Kadel (U.S. 2002/0184401). Rejections presented under Section 101 are made moot by the cancellation of claims 11-14 and 21-23, and the rejection of claim 7 under Section 112 has been addressed by amendment herein. Applicants respectfully disagree with the prior art basis for the rejection of the pending claims, and the claims are amended to more fully distinguish the invention. Reconsideration is requested in view of the following remarks.

The Kadel reference concerns a framework enabling source data components to be developed independently of data consumer components, while claim 7 is directed to a method for managing data in a source file. Although the reference provides commentary regarding use of different objects to "retrieve" data from a variety of file types (e.g., EXCEL, XML) the following recitation of claim 7 is not met by Kadel:

"structuring the [XML] data in the source file in the form of objects, wherein components of the objects are stored in first files, wherein the components each represent a logical unit of an object ... [and] providing a second file ... for ... selectively directly accessing the objects ..."

In this regard, the rejection cites pars. 97, 98 of Kadel, suggesting that this is a disclosure suggesting formation of data (of an extensible mark-up language file) into objects. However, these two passages certainly do not reference data of an extensible mark-up language file and there is not even a basis to draw such an inference. Nor is there any annotation in Figure 14 of Kadel (referenced in par 98) that the discussion might describe applicants' teachings. In fact, the citation only makes mention of "containers" without any functional description that might be similar to applicants' recited structuring of data **into** objects. The rejection (page 3) suggests presence of disclosure that "objects are stored in first files" and that these "files" are described as "object" specific containers, but there is no support for this conclusion. The rejection also cites pars 129 but, again, this disclosure of Kadel is not in the context of XML data.

With respect to the citation of par 226 of Kadel it is respectfully submitted that, although the paragraph describes a source file capable of displaying attributes of an object, this is not the

same as **structuring the data of a source file into objects** with a "second file ...for ... selectively ... accessing the objects ..." In fact, further citation to par 176 for alleged disclosure of applicants' second file is misplaced because that paragraph concerns the set of object oriented programming languages for which XML is not a member.

Moreover, nothing in the Kadel disclosure comports with

"hierarchical structuring of object complexes enabling a reading-in tool to pass over or avoid having to read or process portions of the source file data organized as distinct objects when seeking other portions of the source file data for use in the application ..."

In this regard, the rejection cites Kadel at pars 301, 302, 310, 318 and 334. Despite citation of numerous passages, it is not apparent how the Examiner finds this recitation of claim 7 to be present. Mere disclosure of hierarchical data structures or general XML parsing is not the invention. More is required and more must be found in the prior art to reject the claim.

Conclusion

Several errors in the rejection have been identified. It is respectfully submitted that claim 7 and each of the claims which depends therefrom is novel and nonobvious over any combination of the Kadel reference and the other art of record. If the Examiner continues to contend that every feature of the invention is present in the prior art, then it is incumbent upon the Examiner to cite specific locations in the reference(s) that fully describe the claimed subject matter. The present rejection falls short of such because Kadel simply does not disclose all of the claimed subject matter.


As explained in prior responses, applicants cannot find several of the recited features which the Examiner has argued to be present in the prior art. Applicants must receive the Examiner's express citation of all individual passages providing disclosure of every claim recitation in order to find all of the claimed subject matter in the same level of detail as set forth in the claims. The above discussion concerning claim 7 is exemplary of the deficiency. In view of the foregoing the claims should be passed to allowance.

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The Commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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